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Attorneys for Plaintiff
Capstar Radio Operating Company

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Capstar Radio Operating Company, a Delaware Corporation,	:
	:
Plaintiff,	:
	:
v.	:
	:
Anthony Campbell; Louis Carpino; Adam Gross;	:
Jose Luis Torres; Citadel Broadcasting Corporation,	:
a Nevada Corporation; and John Does 1-10,	:
	:
Defendants.	:
	:
-----X	

NOTICE OF MOTION FOR ORDER ACCEPTING PLAINTIFF'S FILING OF ITS NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

PLEASE TAKE NOTICE THAT, upon the annexed Declaration of L. Lynnette Sarno, dated April 21, 2008, and the exhibits annexed thereto, and the accompanying Memorandum of Law, and upon all of the papers and proceedings herein, Capstar Radio Operating Company ("Capstar") will move this Court on a date and time to be set by the Court, before the Honorable Lewis A. Kaplan, United States District Judge, at the United States Courthouse, United States District Court Southern District of New York, 500 Pearl Street, New York, New York, for an order: (1) accepting Plaintiff's filing of its Notice of Voluntary Dismissal Without Prejudice by ECF on March 25, 2008 against each

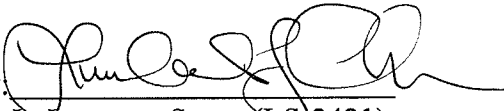
Defendant pursuant to Fed. R. Civ. Pro. Rule 41(a)(1)(A); and or in the alternative, (2) dismissing Plaintiff's Complaint against each Defendant without prejudice, pursuant to Fed. R. Civ. Pro. Rule 41(a)(2), and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with Local Rule 6.1 of the Local Rules of United States District Court for the Southern and Eastern Districts of New York, Defendant's opposition papers to Capstar's motion, if any, are to be served on the undersigned on or before May 5, 2008, and Capstar's reply papers, if any, must be served no later than May 12, 2008.

Dated: New York, New York
April 21, 2008

Respectfully submitted,

SEYFARTH SHAW LLP

By: 

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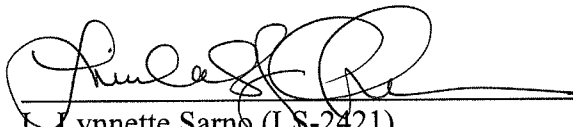
Fax: (212) 218-5526

Attorneys for Defendant Capstar Radio
Operating Company

CERTIFICATE OF SERVICE

L. Lynnette Sarno, certifies that I caused a true and correct copy of *Plaintiff's Motion For an Order Deeming its Notice of Voluntary Dismissal Without Prejudice Effective Pursuant to Rule 41(a)(1)(A)*, via Hand Delivery, on this 21st day of April, 2008 to be served upon:

Jeremy Feigelson, Esq.
Debevoise & Plimpton LLP
919 Third Avenue
New York, New York 10022



L. Lynnette Sarno (LS-2421)